



State of Ohio Environmental Protection Agency

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JAN 27 2004

Thomas V. Skinner
Regional Administrator
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Ohio Recommended Eight Hour Ozone Designations; 120 Day Letter Response

Dear Mr. Skinner:

I am writing to submit Ohio's response to the December 3, 2003 letter from you to Governor Bob Taft concerning Ohio's recommendations for eight-hour ozone nonattainment areas. I appreciate the time and effort that both of our staffs have put forth in an effort to best define these areas.

There were two main areas in which you have identified disagreements with Ohio's recommendations. The first is the separation of adjacent nonattainment areas into distinct nonattainment areas and the second is the exclusion of Belmont County from the Wheeling, West Virginia nonattainment area.

The State of Ohio can accept the combined nonattainment areas. Our planning agencies and the Ohio Department of Transportation believe that the coordination of planning in these adjacent areas will not be a problem. In addition, we believe that control strategies can be developed for specific subparts of a nonattainment area if that is what will create the most cost effective and fair attainment strategy.

The State of Ohio believes that the exclusion of Belmont County is still appropriate. While U.S. EPA has indicated that Belmont County represents a significant fraction of the total MSA emissions, it is a small fraction of the regional emissions.

Since the July 15, 2003 submittal, 2003 ozone data have become available. Based on that data, Lawrence County, which is in the Huntington/Ashland MSA, is measuring attainment at both ozone monitors located in the county. Based on this information, we are revising our recommendation to exclude Lawrence County from this interstate MSA. Lawrence County has a population of less than 65,000 (MSA 315,000) and less than 14,000 commuters in and out of the County. Emissions of VOC and NOx are both below 5,000 tons per year. Land use is over 93% forest and agricultural. It is not a significant source region and it is experiencing attaining the air quality standard. It should be noted that

Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Christopher Jones, Director

Greenup County, Kentucky, which is adjacent to Lawrence County, was recommended by the State of Kentucky to be excluded from this MSA. U.S. EPA has concurred in their 120 day letter that Greenup County should not be part of the Huntington/Ashland nonattainment area.

Ohio EPA will submit the certified 2003 ozone data as soon as it is quality assured. At that time, updated 1-hour and 8-hour design values can be determined.

I appreciate the opportunity to respond to U.S. EPA's concerns and to amend our recommendations based on data from the 2003 ozone season. If you have any questions, please feel free to contact Bill Spires of the Division of Air Pollution Control (614-644-3618).

Sincerely

A handwritten signature in black ink, appearing to read "Christopher Jones", written in a cursive style.

Christopher Jones
Director

enclosures

Belmont: Belmont County is part of the Wheeling West Virginia interstate MSA. The MSA also includes Ohio and Marshall Counties in West Virginia. Belmont County should be excluded from this MSA nonattainment area due to:

- Proximity to the source region/nonattainment area: Belmont County is located west of the Wheeling urban/industrial area. The area would not expect to be impacted by, nor should it be considered a receptor for, the Wheeling area.

- Population: The population of Belmont County is just over 70,000. The MSA total is 153,172. Population in both Belmont County and the MSA is decreasing (-3.8% 1990-2000).

- Emissions: Belmont County emissions of VOC and NOx are 4,750 and 14,342 tons per year, respectively. It should be noted that the primary NOx source in Belmont County is subject to the NOx transport rules and will be significantly reduced. MSA total emissions of VOC and NOx are 11,572 and 72,905 tons per year, respectively. The surrounding area is rural/agricultural.

- Land use: Belmont County is over 95% wooded and agricultural.

- Commuters: Between 11,000 and 12,000 workers commute in or out of the county.

Additional Information

Emissions in the area also include two additional power plants (Kammer and Mitchell). Year 2002 emissions for these facilities total 42,772 tons per year of NOx. Burger is the power plant located within Belmont County with year 2002 NOx emissions of 6,759 tons per year. We do not believe that the Burger power plant or Belmont County represents a significant portion of the regions NOx emissions.

2002 Unit Level Emissions

State	Plant Name	ORISPL	Unit ID	2002 SO2 (tons)	2002 CO2 (tons)	2002 NOx Rate (lb/mmBtu)	2002 NOx (tons)	2002 Heat Input (mmBtu)
Ohio	O H Hutchings	2848	H-4	1,390	211,222	0.60	635	2,086,370
Ohio	O H Hutchings	2848	H-5	1,263	191,259	0.56	540	1,877,966
Ohio	O H Hutchings	2848	H-6	1,315	199,008	0.56	562	1,954,059
Ohio	Omega JV2 Bowling Green	7783	P001	0	1,445	0.14	2	24,316
Ohio	Omega JV2 Hamilton	7782	P001	0	1,181	0.14	2	19,875
Ohio	PG&E Bowling Green	55262	CT1	0	2,538	0.05	1	42,696
Ohio	PG&E Napoleon	55264	CT1	0	1,260	0.04	0	21,196
Ohio	Picway	2843	9	10,457	506,061	0.41	1,098	4,932,338
Ohio	Poston	2844	1	0	0	0.00	0	0
Ohio	Poston	2844	2	0	0	0.00	0	0
Ohio	Poston	2844	3	0	0	0.00	0	0
Ohio	R E Burger	2864	1	0	0	0.00	0	0
Ohio	R E Burger	2864	2	0	0	0.00	0	0
Ohio	R E Burger	2864	3	0	0	0.00	0	0
Ohio	R E Burger	2864	4	0	0	0.00	0	0
Ohio	R E Burger	2864	5	1,117	68,567	0.50		668,295
Ohio	R E Burger	2864	6	1,166	71,544	0.65		697,314
Ohio	R E Burger	2864	7	18,684	1,146,730	0.72		11,176,709
Ohio	R E Burger	2864	8	14,487	889,148	0.51		8,666,160
Ohio	Refuse & Coal	312	001	0	0	0.00	0	0
Ohio	Refuse & Coal	312	002	0	0	0.00	0	0
Ohio	Refuse & Coal	312	003	0	0	0.00	0	0
Ohio	Refuse & Coal	312	004	0	0	0.00	0	0
Ohio	Refuse & Coal	312	005	0	0	0.00	0	0
Ohio	Refuse & Coal	312	006	0	0	0.00	0	0
Ohio	Richard Gorsuch	7253	1	8,127	453,700	0.38	846	4,422,029
Ohio	Richard Gorsuch	7253	2	7,547	421,337	0.38	786	4,106,605
Ohio	Richard Gorsuch	7253	3	7,387	412,375	0.38	769	4,019,254
Ohio	Richard Gorsuch	7253	4	7,946	443,608	0.38	827	4,323,669
Ohio	Richland Peaking Station	2880	CTG4	0	33,024	0.07	19	555,708
Ohio	Richland Peaking Station	2880	CTG5	0	59,369	0.07	38	999,025
Ohio	Richland Peaking Station	2880	CTG6	0	52,745	0.08	36	887,530
Ohio	Robert P Mone	7872	1	0	1,017	0.12	1	16,187
Ohio	Robert P Mone	7872	2	0	10,403	0.04	2	174,444
Ohio	Robert P Mone	7872	3	0	9,447	0.04	2	158,057
Ohio	Tait Electric Generating Station	55248	CT4	0	13,101	0.04	3	220,437
Ohio	Tait Electric Generating Station	55248	CT5	0	14,867	0.04	3	250,160

2002 Unit Level Emissions

State	Plant Name	ORISPL	Unit ID	2002 SO2 (tons)	2002 CO2 (tons)	2002 NOx Rate (lb/mmBtu)	2002 NOx (tons)	2002 Heat Input (mmBtu)
West Virginia	Ceredo Electric Generating Station	55276	03	0	6,069	0.03	2	106,638
West Virginia	Ceredo Electric Generating Station	55276	04	0	6,771	0.03	2	113,932
West Virginia	Ceredo Electric Generating Station	55276	05	0	3,604	0.03	1	60,647
West Virginia	Ceredo Electric Generating Station	55276	06	0	4,034	0.03	1	67,872
West Virginia	Fort Martin	3943	1	45,229	3,737,352	0.29	5,376	36,426,424
West Virginia	Fort Martin	3943	2	45,891	3,814,300	0.31	5,860	37,176,431
West Virginia	Harrison	3944	1	3,150	5,073,389	0.41	10,543	49,448,235
West Virginia	Harrison	3944	2	2,709	4,363,114	0.41	9,067	42,525,473
West Virginia	Harrison	3944	3	2,832	4,561,230	0.41	9,479	44,456,429
West Virginia	John E Amos	3935	1	32,136	5,167,936	0.56	14,392	50,369,770
West Virginia	John E Amos	3935	2	31,748	5,105,469	0.50	12,521	49,760,927
West Virginia	John E Amos	3935	3	43,735	7,155,991	0.47	16,588	69,737,190
West Virginia	[REDACTED]	3947	1	13,393	1,265,497	0.74	[REDACTED]	12,334,281
West Virginia	[REDACTED]	3947	2	12,107	1,144,018	0.74	[REDACTED]	11,150,276
West Virginia	[REDACTED]	3947	3	13,596	1,284,690	0.74	[REDACTED]	12,521,348
West Virginia	Kanawha River	3936	1	8,139	1,342,016	0.49	3,165	13,080,111
West Virginia	Kanawha River	3936	2	7,723	1,273,476	0.49	3,003	12,412,074
West Virginia	[REDACTED]	3948	1	28,280	4,363,100	0.63	[REDACTED]	42,524,714
West Virginia	[REDACTED]	3948	2	27,730	4,278,248	0.73	[REDACTED]	41,697,708
West Virginia	Mountaineer (1301)	6264	1	43,224	8,628,159	0.30	12,911	84,095,132
West Virginia	Mt Storm	3954	1	9,959	4,382,359	0.61	13,181	42,713,041
West Virginia	Mt Storm	3954	2	10,467	4,606,338	0.68	15,314	44,896,067
West Virginia	Mt Storm	3954	3	2,944	3,829,318	0.60	11,380	37,322,782
West Virginia	North Branch Power Station	7537	1A	260	220,791	0.32	347	2,151,926
West Virginia	North Branch Power Station	7537	1B	260	220,638	0.32	347	2,150,436
West Virginia	Phil Sporn	3938	11	6,379	785,517	0.59	2,283	7,656,109
West Virginia	Phil Sporn	3938	21	6,775	834,211	0.59	2,425	8,130,708
West Virginia	Phil Sporn	3938	31	6,966	857,812	0.59	2,494	8,360,741
West Virginia	Phil Sporn	3938	41	7,089	872,963	0.59	2,538	8,508,408
West Virginia	Phil Sporn	3938	51	13,037	1,701,584	0.40	3,445	16,584,642
West Virginia	Pleasants	6004	1	21,667	3,998,976	0.34	6,718	38,976,404
West Virginia	Pleasants	6004	2	20,242	3,706,864	0.37	6,996	36,129,218
West Virginia	Pleasants Energy	55349	1	9	19,982	0.08	10	322,043
West Virginia	Pleasants Energy	55349	2	6	16,888	0.07	7	279,515
West Virginia	Rivesville	3945	7	694	90,853	0.90	417	885,503
West Virginia	Rivesville	3945	8	3,718	479,697	0.67	1,610	4,675,419
West Virginia	Willow Island	3946	1	4,014	365,022	0.58	1,025	3,528,611